

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRUCE BRUMMELL,

Defendant.

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Criminal Action No. 99-56-001

MOTION FOR DETENTION

NOW COMES the United States and moves for the detention of the defendant, Bruce Brummell, pursuant to 18 U.S.C. § 3148(b) and Federal Rules of Criminal Procedure 32.1(a)(6) and 46(d), pending a hearing on the violation of release petition. In support of the motion, the United States alleges as follows: (a) there is probable cause to believe that the defendant has committed a Federal, State, or local crime while on release; (b) there is probable cause to believe that the defendant has violated one or more conditions of his release; (c) that, based on the factors set forth in 18 U.S.C. § 3142(g), there is no condition or combination of conditions of release that will assure that the defendant will not flee or pose a danger to the safety of any other person or the community; and (d) that the defendant is unlikely to abide by any condition or combination of conditions of release.

Respectfully submitted,

COLM F. CONNOLLY
United States Attorney

By:



Edward J. McAndrew
Assistant United States Attorney

Dated: July 21, 2008